

## PATENT

Atty. Dkt. No. APPM/001717.D2.Y1/PPC/ECP/CKIM

## REMARKS

This is intended as a full and complete response to the Non-Final Office Action dated April 25, 2006, having a shortened statutory period for response set to expire on June 25, 2006. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1, 5-9, 11-14 and 21-30 remain pending in the application and are shown above. Claims 1, 5-9, 11-14 and 21-26 stand rejected by the Examiner. Reconsideration of the rejected claims is requested for reasons presented below.

New claims 27-30 are added to clarify the invention. Support for claims 27-30 may be found at least at paragraphs [0032], [0033] and claim 1. These new claims are not presented to distinguish a reference, thus, the claims are entitled to a full range of equivalents.

Claims 1, 5-9, 11-14 and 21-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the *Advances Metallization Conference to Sandhu et al.* in view of U.S. patent 6,178,623 to *Kitazawa et al.* Applicants respectfully traverse the rejection.

*Sandhu et al.* and *Kitazawa et al.* do not disclose bringing the substrate in proximity to a cooling plate as asserted by the Examiner because allowing a substrate to cool to room temperature is not equivalent to bringing a substrate in proximity to a cooling plate. Neither *Sandhu et al.* nor *Kitazawa et al.* disclose or suggest a cooling plate. Therefore, *Sandhu et al.* and *Kitazawa et al.*, alone or in combination, do not teach, show, or suggest bringing a substrate in proximity to a cooling plate, as recited in claims 1 and 11, and claims dependent thereon. Withdrawal of the rejection is respectfully requested.

Applicants further traverse the rejection of dependent claims 5-9, 12-14 and 21-26 on grounds that they depend from claims 1 and 11, which are believed to be allowable. Because claims 1 and 11 are believed to be allowable, it is believed that claims 5-9, 12-14 and 21-26 should be allowable as well. Withdrawal of the rejection is respectfully requested.

The reasoning applied above with regards to claims 1 and 11 is equally applicable to new claims 27-30.

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In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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